

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

v.

MONICA CANNON-GRANT,

Defendant.

Criminal No. 1:22-cr-10057-AK

**DEFENDANT’S ASSENTED TO MOTION TO COMPEL
ATTORNEY CHRISTOPHER LEE MALCOLM TO
PROVIDE DEFENDANT’S COUNSEL WITH CLIENT FILE**

The Defendant, through undersigned counsel (“Counsel”), respectfully moves to compel her former attorney, Christopher Lee Malcolm, to provide her client file—including, but not limited to, all documents that he collected from her—to Counsel.

In support of this Motion the Defendant states that Counsel was appointed on August 28, 2024, to represent the Defendant. The Defendant was previously represented by attorney Christopher Lee Malcolm in this matter. Counsel understands, and Mr. Malcolm has confirmed in writing, that Mr. Malcolm has the Defendant’s client file and that it includes documents from the Defendant. Counsel has reached out to Mr. Malcolm repeatedly to arrange collection of the Defendant’s file and documents.¹ Nevertheless, Mr. Malcolm has not provided the requested file and has not agreed to set a time or date on which Counsel can collect it. In the most recent communications, Counsel informed Mr. Malcolm that the Defendant would be seeking an order

¹ Counsel can make a list of the dates on which they reached out to Mr. Malcolm available at the Court’s request.

from this Court compelling him to produce the file if he did not confirm, this week, a time and date when Counsel could collect the file.

The government assents to this motion.

WHEREFORE, the Defendant requests that the Court enter an order, in a form substantially similar to the accompanying proposed order, compelling Mr. Malcolm to provide Counsel with the Defendant's client file, including any documents the Defendant provided to Mr. Malcolm during the course of his representation in this matter.

Respectfully submitted,

/s/ George W. Vien
George W. Vien (BBO # 547411)
Emma Notis-McConarty (BBO # 696405)
DONNELLY, CONROY & GELHAAR, LLP
260 Franklin Street, Suite 1600
Boston, Massachusetts 02110
(617) 720-2880
gwv@dcglaw.com
enm@dcglaw.com

Dated: June 4, 2025

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that counsel for the parties have conferred in good faith and in an effort to resolve or narrow the issues raised by this Motion. The government assents to this Motion.

/s/ George W. Vien
George W. Vien

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), on June 4, 2025.

/s/ George W. Vien
George W. Vien